

EXHIBIT D

From: [Gulay, Erol](#)
To: [Stewart, Ladan F](#); ["Flumenbaum, Martin"](#); ["Gertzman, Michael E"](#); ["Linsenmayer, Robin"](#); ["Bunting, Kristina"](#); ["Solomon, Matthew"](#); ["Janghorbani, Alexander"](#); ["Bamberger, Nowell D."](#); ["Levander, Samuel"](#); [Ceresney, Andrew J.](#); [Zornberg, Lisa](#); [Guo, Joy](#); [Ford, Christopher S.](#); [Cowan, Jennifer R.](#); [Gressel, Anna](#)
Cc: [Tenreiro, Jorge](#); [Bliss, Dugan](#); [Sylvester, Mark](#); [Waxman, Daphna A.](#); [Daniels, Jon](#); [Moye, Robert M.](#); [Hanauer, Benjamin J.](#)
Subject: RE: SEC v. Ripple - discovery letter
Date: Thursday, May 27, 2021 9:03:59 PM

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Counsel,

In your letter of May 26, you indicated that you are in the process of reviewing interagency communications for privilege and that the privilege review and logging process would "take some time." (Letter from Ladan F. Stewart, at 2.) You also proposed that the parties agree to exchange privilege logs by June 18. (*Id.*)

Ripple agrees to begin rolling productions of its privilege logs by June 18, and to complete its production of privilege logs by July 2, on the condition that the SEC produce on June 18 a privilege log of any interagency communications withheld or redacted for privilege, continue to produce privilege logs on a rolling basis thereafter, and complete its privilege log production by July 2. Let us know if the SEC will agree to that proposal.

Thanks,
Erol

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& Plimpton**

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From: Stewart, Ladan F [<mailto:stewartla@SEC.GOV>]

Sent: Wednesday, May 26, 2021 17:27

To: 'Flumenbaum, Martin'; 'Gertzman, Michael E'; 'Linsenmayer, Robin'; 'Bunting, Kristina'; 'Solomon, Matthew'; 'Janghorbani, Alexander'; 'Bamberger, Nowell D.'; 'Levander, Samuel'; Ceresney, Andrew J.; Zornberg, Lisa; Guo, Joy; Ford, Christopher S.; Gulay, Erol; Cowan, Jennifer R.; Gressel, Anna

Cc: Tenreiro, Jorge; Bliss, Dugan; Sylvester, Mark; Waxman, Daphna A.; Daniels, Jon; Moye, Robert M.; Hanauer, Benjamin J.

Subject: SEC v. Ripple - discovery letter

Counsel:

Please see attached correspondence.

Ladan

Ladan F. Stewart

U.S. Securities and Exchange Commission

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